

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

V.

ALEKSEI YURIEVICH BURKOV,
a/k/a Aleksey Yurevich Burkov,

Defendant.

Case No. 1:15-cr-245-TSE-1

**MOTION TO DESIGNATE HIGHLY
SENSITIVE DOCUMENT AND TO FILE EX PARTE**

The United States, pursuant to this Court’s Second Amended Standing Order (*In Re: Procedures for the Filing, Service, and Management of Highly Sensitive Documents*) entered April 14, 2021, hereby moves this Court for leave to designate the Government’s Response to Forbes Media LLC and Thomas Brewster’s Motion to Intervene and Unseal Judicial Records (“Response”), as well as its memorandum in support of this motion (“Memorandum”), as Highly Sensitive Documents. The United States seeks leave to deliver paper copies of the Response to the clerk’s office for delivery to the Court. The United States also seeks leave to file the Memorandum and the Response ex parte. The government will serve a redacted copy of the Response, omitting the Highly Sensitive material, on Forbes Media LLC and Thomas Brewster.

Respectfully submitted,

Jessica D. Aber
United States Attorney

/s/

Jacqueline R. Bechara
Assistant United States Attorney
United States Attorney's Office
2100 Jamieson Avenue
Alexandria, VA 22314
Office: (703) 299-3700
Fax: (703) 299-3980
Email: jacqueline.bechara@usdoj.gov

RULE 11 CERTIFICATION

I certify that this motion is not being presented for any improper purpose, and that the legal contentions are warranted and non-frivolous, and that the material at issue meets the criteria for designation as a Highly Sensitive Document as set forth in the April 14, 2021 Second Amended Standing Order.

/s/

Jacqueline R. Bechara
Assistant United States Attorney

CERTIFICATE OF SERVICE

I certify that on April 19, 2022, I electronically filed the foregoing motion with the Clerk of Court using the CM/ECF system, which will serve all counsel of record.

By: _____/s/

Jacqueline R. Bechara
United States Attorney's Office
2100 Jamieson Avenue
Alexandria, Virginia 22314
Office: (703) 299-3700
Fax: (703) 299-3980
Email: jacqueline.bechara@usdoj.gov